

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Sherwin-Williams Plant Fire Response - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #4
Progress
Sherwin-Williams Plant Fire Response
A6WT
Garland, TX
Latitude: 32.9080210 Longitude: -96.6667990

To: Craig Carroll, Region 6
Brendan Roache, OEM
Anthony Buck, TCEQ

From: Eric Delgado, FOSC

Date: 8/10/2023

Reporting Period: 8/10/2023

1. Introduction

1.1 Background

Site Number:	A6WT	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/7/2023	Start Date:	8/7/2023
Demob Date:		Completion Date:	
CERCLIS ID:	TXN000622299	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA emergency response with potentially responsible party (PRP) oversight at a paint manufacturing facility.

1.1.2 Site Description

1.1.2.1 Location

The incident occurred at an active paint manufacturing facility in Garland, Texas. The facility is located within a primarily commercial/industrial area at 701 South Shiloh Road, Garland, Dallas County, Texas 75042 (Site). A large residential neighborhood is located approximately 0.25 miles southeast of the Site. Two bodies of water, Stream 2C4 and Duck Creek, flow through the residential neighborhood.

1.1.2.2 Description of Threat

The following table provides chemicals that were potentially released from the facility :

Hydrogen Cyanide	Ammonia	Ethylene glycol	n-Butyl acrylate
PFAS	Ammonium hydroxide	Ethylene glycol monoethyl ether	Nonylphenoxypoly(ethoxy)ethanol
1,2,4-Trimethylbenzene	Ammonium persulfate	Ethylene glycol monophenyl ether	o-Xylene
1,4-Dioxane	Benzene	Ethylene oxide	Pentadecafluorooctanoic acid (PFAO)
1-Butanol	Bisphenol A	Formaldehyde	Propylene oxide
2-Butoxyethanol	Cumene	Formic acid	Sodium nitrate
2-Pentanone, 4-methyl-	Cyclohexane	Hexachlorobenzene	Styrene
2-Phenoxyethanol	Dibenzoyl peroxide	Hexamethylene diisocyanate	Tert-Butyl alcohol
4,4-Methylenediphenyl diisocyanate	Diethanolamine	Hydroquinone	Toluene
4-Nonylphenol, branched and linear, ethoxylated	Diethylene glycol monobutyl ether	Isocyanic acid, polymethylenepolyphenylene ester	Triethylamine
Acetaldehyde	Diethylene glycol monoethyl ether	Methyl alcohol	Xylenes
Acrolein	Epichlorohydrin	Methyl methacrylate	Zinc pyrrhione
Acrylamide	Ethyl acrylate	Naphthalene	
Acrylic Acid	Ethylbenzene	Naphthenic acids, zinc salts	

The facility was unable to shutoff the fire suppression system during the incident which resulted in the release of an unknown amount of aqueous fire-fighting foam (AFFF) and firewater into storm drains that discharged into Stream 2C4. Stream 2C4 flows into Duck Creek which ultimately flows into the East Fork of the Trinity River. Several odor complaints were reported by members of the community to EPA and TCEQ.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA, TCEQ, the City of Garland, and Sherwin Williams continue to operate in Unified Command to accomplish the following incident objectives:

- (1) Conduct all field activities in a manner to ensure health and safety following the HASP.
- (2) Identify critical resource needed by the Incident Command and field personnel.
- (3) Establish Emergency Response procedures to accomplish the following.
 - a. Ensure the safety of the public and responders.
 - b. Conduct air monitoring in neighboring communities, sensitive receptors, commercial lots, and/or any industrial properties near the site.
 - c. Conduct General Facility Assessment.
 - d. Assess firewater/AFFF runoff and its potential affects to human health and the environment by entering Creek 2C4.
 - e. The RP is collecting multimedia samples at the Site, and downstream of the Site.
 - f. The RP is assessing and documenting polymer tank integrity and temperatures at the Site which could potentially lead to secondary explosions.
- (4) Utilize EPA GeoPlatform dashboards to track Site operations.
- (5) Use GeoPlatform dashbaords to track Site operations.
- (6) Offload hazardous self-reactive chemical tanks of acrylic acid and methacrylic acid and tansport offsite.
- (7) Delineate impacted waters of the United States or impacted soils.
- (8) Remediate the impacted portion of Duck Creek and any other impacted waters of the United States or impacted soils.
- (9) Prevent the further migration of released materials along Duck Creek and any other impacted waterways.
- (10) Recover released materials, stage the resulting waste and dispose of the resulting waste.
- (11) Sample and analyze for residential contaminants within the soil and water present at impacted areas.

2.1.2 Response Actions to Date

On 8/10/2023, EPA contracted HAZMAT specialists provided oversight of Sherwin Williams efforts to transfer acrylic acid and methacrylic acid from the facility ASTs to tanker trucks. Sherwin Williams completed the transfer operation and transported the tankers off-site at approximately 9PM. EPA coordinated with TDEM to conduct flyovers of the East Fork Trinity River and Trinity River in an effort to identify the furthest extent of visible AFFF on waterways. EPA will evaluate the data from the flyovers to determine the most appropriate location for constructing a final containment and collection point along the impacted waterways. Sherwin Williams is preparing to recover AFFF at the identified location using a foam fractionation process which involves aerating impacted waters and then collecting fractionated foam with a combination of sorbent booms and vacuum trucks. Aerating impacted waters at the identified location is also expected to agitate some dissolved VOCs and SVOCs out of the water column. Sherwin Williams will conduct air monitoring at the aeration locations. An EPA toxicologist arrived on-site on the morning 08/10/23. The EPA toxicologist assisted with reviewing analytical results from Sherwin Williams' and TCEQ's sampling efforts, provided feedback on site-specific data quality objectives and supported EPA's public risk communication efforts. Sherwin Williams started door-to-door requests to gain access to the properties; however, many residents were not home, so the door knocking effort will continue through 8/13/2023. EPA, TCEQ, TPW, and the City of Garland continued documentation of the recovery and containment operations, sampling operations, and wildlife impacts.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Potentially Responsible Party (PRP) is Sherwin Williams.

2.1.4 Progress Metrics

As of the morning August 10, 2023:

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
AFFF/Firefighting water	Water/Product Mixture	~700,000 gallons	Various	N/A	

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Sherwin Williams will continue recovery efforts with vacuum trucks and frac tanks to recover AFFF fluids and firewater from Stream 2C4, Duck Creek, and the impacted retention pond. Installation and maintenance of the containment structures (dams, berms, etc.) will also be monitored by Sherwin Williams. Sherwin Williams will continue community outreach efforts in an effort to obtain right of entries to access portions of Stream 2C4 and Duck creek which run through several residential properties. Sherwin Williams is prepared to begin foam fractionation operations at upstream and downstream locations to collect released materials. Additionally, Sherwin Williams stated to EPA that they are currently looking into potentially installing barriers with membranes designed to adsorb polyfluorinated compounds (PFCs).

EPA will continue to provide oversight and documentation Sherwin Williams' containment, recovery, and sampling operations. EPA will also continue to monitor additional downstream impacted waterways with the assistance of unmanned aerial drones for visible contamination and wildlife impacts. EPA's surface water reconnaissance efforts on 8/11/23 will focus on delineating the furthest extent of visible impact.

2.2.2 Issues

There are no issues to report.

2.3 Logistics Section

No information to report.

2.4 Finance Section

2.4.1 Narrative

No information to report at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

No information to report.

2.5.2 Liaison Officer

No information to report.

2.5.3 Information Officer

No information to report.

3. Participating Entities

3.1 Unified Command

EPA, TCEQ, City of Garland, and Sherwin Williams continue to operate in Unified Command.

3.2 Cooperating Agencies

EPA is working closely with the following federal, state and local agencies during this response: US Department of the Interior, US Fish and Wildlife Service, Texas Parks and Wildlife Department, TDEM, TCEQ, City of Garland Fire Department, City of Garland Police Department, City of Garland Emergency Management, North Texas Municipal Water District.

4. Personnel On Site

- EPA FOSCs
- EPA PIO
- EPA ERRS
- EPA START
- TCEQ
- TDEM
- City of Garland Fire Department
- City of Garland Police Department
- City of Garland Emergency Management
- North Texas Municipal Water District
- Sherwin Williams
 - Miller Environmental
 - Center for Toxicology and Environmental Health (CTEH)
 - TAS Environmental
 - Cactus Environmental

5. Definition of Terms

above ground storage tank (AST)
aqueous fire-fighting foam (AFFF)
Airborne Spectral Photometric Environmental Collection Technology (ASPECT)
Center for Toxicology and Environmental Health (CTEH)
chemicals of concern (CoCs)
EPA Federal On-Scene Coordinator (FOSC)
Garland Fire Department (GFD)
Garland Police Department (GPD)
meter (m)
particulate matter less than 2.5 micrometers in diameter (PM 2.5)
parts per million (ppm)
polyfluorinated compounds (PFCs)
Potentially Responsible Party (PRP)
Superfund Technical Assessment and Response Team (START)
Texas Commission of Environmental Quality (TCEQ)
volatile organic compounds (VOCs)

6. Additional sources of information

6.1 Internet location of additional information/report

Additional information may be obtained at response.epa.gov/SherwinWilliamsPlantFireResponse.

6.2 Reporting Schedule

A progress POLREP will be submitted as determined appropriate by the EPA OSC and a final POLREP will be submitted upon completion of the response.

7. Situational Reference Materials

No information available at this time.